



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

TMS  
F.# 2011R01325

*610 Federal Plaza  
Central Islip, New York 11722*

January 6, 2012

**Via Hand Delivery**

Paul Peter Rinaldo, Esq.  
Grossman, Lavine & Rinaldo  
108-18 Queens Boulevard  
8<sup>th</sup> Floor - Suite 5  
Kew Gardens, NY 11375

Re: United States v. Alex Alxonzo  
Criminal Case No. 11-699 (ADS) (ARL)

Dear Mr. Rinaldo:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following discovery with respect to the above-referenced case. The government also hereby requests reciprocal discovery.

Documents and Tangible Objects

Records Available - The government hereby furnishes the following records and documents on compact disk:

DESCRIPTION	BATES NO.
Criminal History Report	0001 - 0009
Arrest Warrant, EDNY US District Court 11-MJ-879	0010
FBI-302 Statement dated 09/09/11	0011 - 0015
Nassau County Medical Examiner DNA reports	0016 - 021
Nassau County Police Photo Lineup	0022

Screen capture of text message on telephone number (347) 818-4613	0023 - 0027
CD containing Audio/Synopsis re calls involving Alex Alonzo	1 CD
CD containing video footage dated 07/20/11	1 CD

You may call me to arrange a mutually convenient time to inspect, copy, and/or photograph the evidence and original documents discoverable under Rule 16.

#### The Defendant's Required Disclosures

The government hereby requests reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, data, photographs, tapes, tangible objects, or copies or portions thereof, which are in the defendant's possession, custody or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results of reports or physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, which are in the defendant's possession, custody, or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial or which were prepared by a witness whom the defendant intends to call at trial.

The government also requests that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid any unnecessary delay, we request that you have copies of these statements available for production to the government no later than the commencement of trial.

Pursuant to Fed. R. Crim. P. 12.3, the government hereby demands written notice of the defendant's intention, if any, to claim a defense of actual or believed exercise of public authority, and also demands the names and addresses of the witnesses upon whom the defendant intends to rely in establishing the defense identified in any such notice.

The government also requests that the defendant disclose a written summary of testimony the defendant intends to use under Rules 702, 703, and 705 of the Federal Rules of Evidence. The

summary should describe the opinions of the witnesses, the bases and reasons for those opinions, and the witnesses' qualifications.

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH  
UNITED STATES ATTORNEY

By: /s/ Thomas M. Sullivan  
Thomas M. Sullivan  
Assistant United States Attorney  
(631) 715-7865

Enclosures

cc: Clerk of Court (ADS) (without enclosures)